

UNITED STATES APPEALS COURT  
FIRST CIRCUIT

UNITED STATES of AMERICA                    )  
                    Appellee                        )  
  )  
vs.   )  
  )  
MELVIN RICHARDSON                         )  
                    Defendant/Appellant        )

**MOTION TO APPOINT APPELLATE COUNSEL**

Now comes the defendant and respectfully requests this Honorable Court appoint him appellate counsel for the purpose of :

1. Pursuing his own appeal relative to findings and rulings which were adverse to him.

As grounds for this request counsel states he has filed a Motion to Withdraw with attached Affidavits stating the reason he can longer represent the defendant. In addition, counsel was privately retained and defendant reports to be indigent and has no ability to retain any counsel for appellate purposes.

The District Court allowed defendant's request to proceed *in forma pauperis* on 10/13/06.

Respectfully submitted,

DEFENDANT

BY:/s/ Vincent A. Bongiorno, Esq.  
95 State Street - Suite #309  
Springfield, MA 01103  
(413) 732-0222  
BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to United States Attorney, Paul Smyth, 1550 Main Street, Springfield, MA this 25 day of October 2006.

/s/ Vincent A. Bongiorno